

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

CHEVRON CORPORATION,

*Plaintiff,*

v.

STEVEN DONZIGER, *et al.*,

*Defendants.*

No. 11-CIV-0691 (LAK)

**NOTICE OF MOTION TO DISMISS FOR LACK OF SUBJECT-MATTER  
JURISDICTION OF STEVEN R. DONZIGER, THE LAW OFFICES OF STEVEN R.  
DONZIGER, AND DONZIGER & ASSOCIATES, PLLC**

PLEASE TAKE NOTICE that upon the memorandum of law submitted herewith, defendants Steven R. Donziger, The Law Offices of Steven R. Donziger, and Donziger & Associates, PLLC, by and through their undersigned counsel, move this Court for an order dismissing this action for lack of jurisdiction pursuant to Federal Rule of Civil Procedure 12(h)(3).

Respectfully submitted,

/s/ Richard H. Friedman  
RICHARD H. FRIEDMAN  
FRIEDMAN | RUBIN  
1126 Highland Avenue  
Bremerton, WA 98337  
Tel: (360) 782-4300  
Fax: (360) 782-4358

/s/ Zoe Littlepage  
ZOE LITTLEPAGE  
LITTLEPAGE BOOTH  
2043A West Main  
Houston, TX 77098  
Tel: (713) 529-8000  
Fax: (713) 529-8044

*Of Counsel:*

DEEPAK GUPTA  
GUPTA BECK PLLC  
1625 Massachusetts Avenue, NW  
Washington, DC 20036  
Tel: (202) 888-1741  
Fax: (202) 328-7030

*/s/ Steven R. Donziger*  
STEVEN R. DONZIGER  
245 W. 104th Street, #7D  
New York, NY 10025  
Tel: (212) 570-4499  
Fax: (212) 409-8628

January 22, 2013

*Attorneys for Steven R. Donziger, Law  
Offices of Steven R. Donziger, and  
Donziger & Associates, PLLC*